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**State Farm General Insurance Company and
State Farm Fire & Casualty Company**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GILBERTO MIRANDA, an individual; BONNIE
LO, an individual; CHAD TERRY, an individual;
THOMAS MOFFITT, an individual,

Plaintiffs,

vs.

STATE FARM GENERAL INSURANCE
COMPANY; STATE FARM FIRE & CASUALTY
COMPANY; DOES 1-10; and ROE LEGAL
ENTITIES 1-10,

Defendants.

Case No.: 2:23-cv-01780-JAD-DJA

**STIPULATION TO REOPEN AND
CONTINUE DISCOVERY AND AMENDED
SCHEDULING ORDER PURSUANT TO
FED. R. CIV. P. 26(f) AND LOCAL RULE
26-1(b)**

Plaintiffs Gilberto Miranda, Bonnie Lo, Chad Terry, Thomas Moffitt (hereinafter "Plaintiffs"), and Defendants State Farm General Insurance Company and State Farm Fire & Casualty Company (hereinafter "Defendants"), following hearing before the Court on August 14, 2024, hereby stipulate to re-opening and continuance of discovery as addressed by the Court and as outlined herein, and submit this updated Joint Proposed Discovery Plan and Scheduling Order Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1(b). Deadlines that fall on a Saturday, Sunday, or legal holiday have been scheduled for the next judicial day.

LR 26-1(b)(1) Discovery Cut-Off Date: Following recent motion practice before the Court, the parties stipulate that the last day of discovery shall be **Wednesday, November 13, 2024**.

LR 26-1(b)(2) Amending of Pleadings and Adding of Parties: The deadline to file Motions to amend pleadings or add parties has passed and shall remain closed.

LR 26-1(b)(3), Fed. R. Civ. P. 26(a)(2) Disclosures (Experts): Disclosure of experts shall proceed as follows: Plaintiff's initial disclosure deadline has passed and shall remain closed. Defendants shall disclose their experts at least sixty (60) days before the discovery cut-off date, by **Friday, September 13, 2024**. Plaintiffs and Defendants shall disclose their rebuttal experts at least thirty (30) days after the initial date for disclosure of experts, by **Monday, October 14, 2024**.

Further, each party agrees to make their experts available for deposition and facilitate the same prior to the discovery cut-off.

LR 26-1(b)(4) Dispositive Motions: The parties shall have until **Friday, December 13, 2024** to file dispositive motions. This does not exceed the outside limit of thirty (30) days following the discovery cut-off that LR 26-1(b)(4) presumptively sets for filing dispositive motions.

LR 26-1(b)(5) Pre-Trial Order: The pre-trial order shall be filed by **Monday, January 13, 2025**, which is 30 days after the date set for filing dispositive motions pursuant to LR 26-1(b)(5). This date is suspended if the dispositive motions are timely filed. In such a case, the pretrial order shall be filed thirty (30) days after the Court files an Order on any dispositive motions. The disclosures required by FRCP 26(a)(3) shall be made in the joint pretrial order.

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Activity	Date
Amend Pleadings	CLOSED
Expert Disclosures	PLAINTIFFS – Closed DEFENDANTS - Friday, September 13, 2024
Rebuttal Expert Disclosures	Monday, October 14, 2024
Discovery Cut-Off Date	Wednesday, November 13, 2024
Dispositive Motions	Friday, December 13, 2024
Pretrial Order	Monday, January 13, 2025

Dated this 21st day of August, 2024.

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Dated this 21st day of August, 2024.

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IT IS SO ORDERED.


 UNITED STATES MAGISTRATE JUDGE
 DATED: 8/22/2024